

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

ALINA BOYDEN and
SHANNON ANDREWS,

Plaintiffs,

v.

Case No. 17-CV-0264

STATE OF WISCONSIN DEPARTMENT
OF EMPLOYEE TRUST FUNDS, et al.,

Defendants.

**DECLARATION OF LAWRENCE MAYER
IN SUPPORT OF STATE DEFENDANTS' REPLY
IN SUPPORT OF SUMMARY JUDGMENT**

I, **LAWRENCE MAYER**, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I have been retained by counsel for the State Defendants as an expert in the above-captioned lawsuit to provide an expert opinion. My qualifications to express an expert opinion on the efficacy, safety, and optimality of hormonal and surgical interventions for the treatment of gender dysphoria are outlined in my opening expert report, dated April 19, 2018.

2. On June 27, 2018, I received from State Defendants' counsel supplemental expert reports authored by Dr. Stephanie Budge and Dr. Loren Schechter.

3. It was not my understanding that Plaintiffs were permitted to submit supplemental expert reports, and so I was not expecting to receive these reports. Nevertheless, I have been able to conduct a preliminary review of the opinions expressed in those supplemental reports and the studies cited therein. Nothing I have seen so far in those opinions or studies changes my own opinion, expressed in my original report dated April 19, 2018, that medical and surgical treatments have not been demonstrated to be safe and effective for treating gender dysphoria.

4. Subject to leave from this Court, I reserve the right to respond to the specific opinions in Plaintiffs' supplemental expert reports, once I have had adequate time to fully review those reports and formulate my responsive opinion.

5. I understand that the Hayes Directory is an organization that performs analysis of available evidence regarding the safety and efficacy of medical treatments for various diagnoses. I understand that it is a reliable authority for this type of analysis.

6. Attached as Exhibit A to this declaration is a true and correct copy of three reports released by the Hayes Directory regarding sex reassignment surgery for the treatment of gender dysphoria, hormone therapy for the treatment of gender dysphoria, and ancillary procedures and services for the treatment of gender dysphoria. The conclusions reached in

these reports are consistent with my own analysis of the state of available evidence regarding the safety and efficacy of various medical treatments for gender dysphoria.

I declare under penalty of perjury that the forgoing is true and correct.

Executed on

7/9/18


LAWRENCE MAYER

Mayer Exhibit A (filed under seal)